


Approved by:

  
KRISTEN L. DORFMAN  
Special Assistant United States Attorney

Before: THE HONORABLE MARTIN R. GOLDBERG  
United States Magistrate Judge  
Southern District of New York

22 MJ 1817

-----X  
UNITED STATES OF AMERICA

-v-

BRADLEY DROWN

Defendant

MISDEMEANOR  
COMPLAINT

Violation of  
NYVTL 1192(2)  
NYVTL 1131  
NYVTL 1128(a)

COUNTY OF OFFENSE:  
ORANGE

-----X  
UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK, ss.:

BRYAN KNAUFF, being duly sworn, deposes and says that he is a Court Liaison, assigned to the United States Military Academy, West Point, New York, and charges as follows:

COUNT ONE

On or about December 3, 2021, on the West Point Military Reservation, within the special maritime and territorial jurisdiction of the United States, in the Southern District of New York, BRADLEY DROWN, the defendant, unlawfully, knowingly, and willfully did operate a motor vehicle upon a public roadway while intoxicated, to wit, the defendant operated a motor vehicle on Stony Lonesome Road, West Point, New York, with a blood alcohol content of .178.

(New York State Vehicle & Traffic Law, Section 1192(2))

COUNT TWO

On or about December 3, 2021, on the West Point Military

Reservation, within the special maritime and territorial jurisdiction of the United States, in the Southern District of New York, BRADLEY DROWN, the defendant, unlawfully, knowingly, and willfully did drive a motor vehicle on a shoulder of a public roadway, to wit, the defendant drove a motor vehicle on the shoulder of Stony Lonesome Road, West Point, New York, and struck the bollard and concrete base of Stony Lonesome Gate.

(New York State Vehicle & Traffic Law, Section 1131)

COUNT THREE

On or about December 3, 2021, on the West Point Military Reservation, within the special maritime and territorial jurisdiction of the United States, in the Southern District of New York, BRADLEY DROWN, the defendant, unlawfully, knowingly, and willfully failed to drive in a single on the roadway, to wit, the defendant drove a motor vehicle on Stony Lonesome Road, West Point, New York, and failed to stay in his lane traffic by swerving and hitting the bollard and concrete base of Stony Lonesome Gate.

(New York State Vehicle & Traffic Law, Section 1128(a))

The basis for the deponent's knowledge and for the foregoing charges are, in part, as follows:

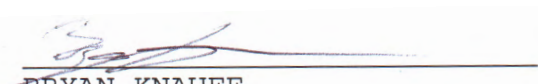
1. I am a Court Liaison, assigned to the Provost Marshal Office, at the United States Military Academy, West Point, New York, which is located in the Southern District of New York.
2. Upon information and belief, on or about December 3, 2021, at approximately 10:51 p.m., Corporal Santana of the Military Police notified Desk Sergeant, SGT Johnson of a traffic accident adjacent to Stony Lonesome Gate. An investigation revealed that a vehicle operated by the defendant, had been traveling south on Stony Lonesome Road in the outbound lane and struck the bollard next to the gate. The defendant continued to drive and struck the concrete base of the gate. He continued to drive but stopped about 30 feet from the gate. CPL Santana approached the vehicle and noticed an odor of alcohol emanating from the vehicle. While talking to the defendant, CPL Santana noticed the defendant had slurred speech, blood shot eyes and a strong odor of alcohol emanating from his person and the vehicle. SGT Walls was dispatched to assist and attempted to administer the standardized field sobriety tests, but the defendant was not cooperative and was administered a preliminary breath test,

which provided a positive reading for the presence of alcohol and displayed a readout of 0.291.


3. The defendant was apprehended for suspicion of drunk driving and transported to the Military Police Station for processing. He was advised of his legal rights which he invoked. The defendant did consent to chemical testing and transported to the Keller Army Community Hospital. A blood sample was taken and the results were a BAC of .178.

5. The defendant was processed and issued a United States District Court Violation Driving while Intoxicated (8005061/SY10), a United States District Court Violation for Failure to Maintain a Single Lane of Travel (8005062/SY10) and United States District Court Violation for Driving on the Shoulder of Roadway (8005063/SY10). The defendant was released to his chain of command.

**WHEREFORE**, deponent prays that the above-named defendant be imprisoned or bailed, as the case may be.

  
\_\_\_\_\_  
BRYAN KNAUFF  
Court Liaison

Sworn to before me this  
24th day of February, 2022

  
\_\_\_\_\_  
HONORABLE MARTIN R. GOLDBERG  
United States Magistrate Judge  
Southern District of New York





**DEFENSE HEALTH AGENCY**  
**115 PURPLE HEART DRIVE**  
**DOVER AIR FORCE BASE, DELAWARE 19902**

Armed Forces  
 Medical Examiner  
 System

**FORENSIC TOXICOLOGY EXAMINATION**  
**FINAL REPORT**

Case #: 214443  
 Name: DROWN, BRADLEY MICHAEL  
 SSN/DoD: 1536562067  
 Case type: DWI  
 Incident date: 03-Dec-2021  
 Submission date: 08-Dec-2021

Report issued:  
 23-Dec-2021  
 COMMANDING OFFICER  
 KELLER ARMY COMMUNITY HOSPITAL  
 900 WASHINGTON ROAD  
 WEST POINT, NY 10996

**EVIDENCE.**

<u>Item #</u>	<u>Specimen</u>	<u>Container</u>	<u>Condition</u>
1	Urine	80 mL liquid container	GOOD
2	Blood	3 mL gray top vial	GOOD

**SCREENS.**

<u>Item #</u>	<u>Assay</u>	<u>Cut Off</u>	<u>Method</u>
2	Ethanol, methanol, isopropanol, acetone	0.020 g%	Headspace GC-FID

**CONFIRMS.**

<u>Item #</u>	<u>Analyte</u>	<u>Result</u>	<u>Cut Off</u>	<u>Method</u>
2	Ethanol	0.178 g%	0.020 g%	Headspace GC-FID
1	Ethanol	0.242 g%	0.020 g%	Headspace GC-FID

**REVIEWED AND RELEASED BY:**

SHIMOMURA.ERIC  
 .TARO.1023634933  
Digitally signed by SHIMOMURA.ERIC.TARO.1023634933  
 Date: 2021.12.23 07:27:13 -05'00'

**Certifying Toxicologist**

**REVIEWED AND RELEASED BY:**

ROMANPEREZ.E  
 RICK.1409150710  
Digitally signed by ROMANPEREZ.ERICK.1409150710  
 Date: 2021.12.30 10:26:03 -05'00'

**Certifying Toxicologist**

*Per AFMES/Division of Forensic Toxicology policy, all specimens that yield a positive analytical result will be retained by AFMES for a minimum of 2 years and specimens yielding a negative analytical result for a minimum of 60 days following the report date of the case in question. Specimens submitted to AFMES for analysis will not be returned to the submitting command.*

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